

Matthew D. Stockwell, Esq.
PILLSBURY WINTHROP SHAW PITTMAN LLP
1540 Broadway
New York, New York 10036-4039
(212) 858-1000
Attorneys for Defendant New York University

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HUDSON INSURANCE COMPANY,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 2:14-CV-07326
	:	(SDW-SCM)
vs.	:	
	:	
GREENWICH INSURANCE	:	
COMPANY; INDIAN HARBOR	:	NOTICE OF MOTION TO DISMISS
INSURANCE COMPANY;	:	PLAINTIFF HUDSON INSURANCE
CONSULTING & TESTING	:	COMPANY’S COMPLAINT
SERVICES, INC.; NEW YORK	:	
UNIVERSITY; and ABC	:	
INSURANCE COMPANIES,	:	
	:	
Defendants.	:	

TO: Shaji M. Eapen, Esq.
Morgan Melhuish Abrutyn
651 West Mt. Pleasant Avenue, Ste. 200
Livingston, NJ 07039
Attorneys for Plaintiff Hudson Insurance Company

Charles Stoia
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
Morristown, NJ 07962-1997
(973) 538-4006
Attorneys for Defendants Greenwich Insurance Company
and Indian Harbor Insurance Company

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Matthew D. Stockwell, sworn to on February 13, 2015, and the accompanying Memorandum of Law, the undersigned attorneys for defendant New York University (“NYU”) will move, at the United States Courthouse located at 15 Walnut Street, Newark, New Jersey (Courtroom MLK-5C) before the Honorable Susan D. Wigenton, U.S.D.J., on the 16th day of March, 2014, at 9:00 a.m., or as soon thereafter as counsel may be heard, for an Order, pursuant to FRCP 12(b)(1) and 12(b)(6), dismissing plaintiff Hudson Insurance Company’s Complaint, with prejudice, for lack of subject matter jurisdiction.

A proposed form of order is submitted herewith.

Dated: February 13, 2015

Respectfully submitted,

/s/ Matthew D. Stockwell

Matthew D. Stockwell (MS-1804)

PILLSBURY WINTHROP SHAW PITTMAN LLP

1540 Broadway

New York, New York 10036-4039

(212) 858-1000

Attorneys for Defendant New York University